

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

EUGENIA KALOUDIS, Individually,	:	CIVIL ACTION
and as Administratrix of the Estate	:	
of GEORGE KALOUDIS, Deceased	:	
	:	
	:	
vs.	:	
	:	
STAR TRANSPORT, INC.	:	
and BRIAN L. MILES	:	NO. 02-CV-4482

**THE PARTIES' RULE 16 CONFERENCE MEMORANDUM**

Pursuant to the Honorable Bruce W. Kauffman's Rule 16 Conference Order of August 8, 2002, the parties met on August 14, 2002 and propose to this Honorable Court that the following schedule be adopted.

A. That Rule 26(A) self disclosure shall be exchanged within two weeks from the date of the August 14, 2002 meeting.

B. The parties propose that the following discovery schedule should be adhered to:

1. That any joinder or amendments to pleadings be done within thirty (30) days of the signing of the Court's anticipated scheduling order.

2. That discovery shall be completed within five (5) months of the Court's anticipated signing of the scheduling order.

3. That expert reports be exchanged within six (6) months of the Court's anticipated signing of the scheduling order. That any rebuttal expert report be submitted within seven (7) months of the Court's anticipated signing of the scheduling order.

4. That any pre-trial memoranda, and any dispositive or nondispositive motions be filed within eight (8) months of the Court's anticipated signing of the scheduling order.

C. Settlement. The parties would hope that this case could be amicably settled but the parties will need to conduct certain discovery before meaningful settlement negotiations can be conducted.

D. Magistrate Referral. The parties would need additional time to decide whether an agreement can be made to refer this case to U.S. Magistrate Jacob P. Hart.

E. Trial Length. It is anticipated that this case can be tried within five (5) trial days.

F. Basis for Jurisdiction. This is a diversity case with the amount in controversy more than \$100,000. It is a death case.

G. Certification. The below parties certify that we have met and conferred on each of the above matters and approve of the contents of this Rule 16 Memorandum.

H. Other. The parties believe that a settlement conference would be helpful to have at some point.

Respectfully submitted,

RAYNES McCARTY BINDER ROSS & MUNDY

By \_\_\_\_\_  
A. ROY DeCARO  
Counsel for Plaintiff

FOX GREENBERG, P.C.

By \_\_\_\_\_  
JOHN F. FOX, JR.  
Counsel for Defendants